

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

MICHELE L. RAFFERTY,           )  
et al.,                                )  
                    Plaintiffs,        ) Case No.  
                    -vs-                        ) 4:16CV00430  
TRUMBULL COUNTY, OHIO,        ) Judge Benita  
et al.,                                ) Pearson  
                    Defendants.        )

- - - o0o - - -

Deposition of KATIE SHERMAN, a  
Plaintiff herein, being called by the  
Defendants as if upon cross-examination  
under the statute, and taken before Angelika  
P. Shane, a Notary Public within and for the  
State of Ohio, pursuant to agreement of  
counsel, on Thursday, the 23rd day of  
February, 2017, at 3:05 p.m., at the offices  
of Mazanec, Raskin & Ryder Co., LPA, 34305  
Solon Road, Solon, Ohio.

- - - o0o - - -

1 APPEARANCES:

2  
3 ON BEHALF OF THE PLAINTIFFS:

4  
5 Ford, Gold, Kovoor & Simon, Ltd.

6 Sarah Thomas Kovoor, Esq.

7 Thomas D. Lambros, Esq. (Of Counsel)

8 8872 East Market Street

9 Warren, Ohio 44484

10 330-856-6888

11 kovoor@neo-lawgroup.com

12 lambros@neo-lawgroup.com

13  
14  
15 ON BEHALF OF THE DEFENDANTS

16 TRUMBULL COUNTY, OHIO, TRUMBULL COUNTY

17 SHERIFF'S DEPARTMENT, THOMAS L.

18 ALTIERE, SHERIFF, AND ERIC SHAY,

19 LIEUTENANT:

20  
21 Mazanec, Raskin & Ryder Co., LPA

22 Todd M. Raskin, Esq.

23 34305 Solon Road

24 100 Franklin's Row

25 Solon, Ohio 44139

1 440-248-7906

2 traskin@mrirlaw.com

3  
4  
5 ON BEHALF OF THE DEFENDANT

6 CHARLES DRENNEN:

7  
8 Fishel Hass Kim Albrecht Downey, LLP

9 Angelica M. Jarmusz, Esq.

10 400 South Fifth Street Suite 200

11 Columbus, Ohio 43215

12 614-221-1216

13 ajarmusz@fishelhass.com

14  
15  
16 ALSO PRESENT: Michele Rafferty

17 Robin Wilson

18  
19 - - -

1 P-R-O-C-E-E-D-I-N-G-S

2 - - -

3 KATIE SHERMAN, of lawful age, a  
4 Plaintiff herein, having been first duly  
5 sworn, as hereinafter certified, deposes and  
6 says as follows:

7 - - -

8 CROSS-EXAMINATION OF KATIE SHERMAN

9 BY MR. RASKIN:

10 Q So, Ms. Sherman, you sat through the  
11 deposition of Ms. Rafferty, and do you want  
12 me to go over kind of the rules of the  
13 deposition or the things you need to  
14 remember, or are you pretty comfortable?

15 A I'm good.

16 Q How would you like me to refer to you?

17 A Katie.

18 Q And how are you feeling?

19 A Good.

20 Q When is your baby due?

21 A He's due May 7th, but I think he's  
22 coming anywhere from April 20th to the 27th.

23 Q Is it a he?

24 A Mm-hmm.

25 Q Congratulations. So give us your full

1 name and current residence address, would  
2 you, please?

3 A Katie Lynn Sherman and I live at 6280  
4 1/2 South Main, Ashtabula, Ohio, 44084.

5 Q And who do you live there with?

6 A My mother.

7 Q How long have you lived there?

8 A Since December I want to say.

9 Q Where did you live before that?

10 A Here and there. I stayed with family  
11 or friends because I didn't get along with  
12 my mom.

13 Q So have you had a reconciliation?

14 A Hmm?

15 Q Have you had a reconciliation with your  
16 mom?

17 A We just butt heads a lot.

18 Q But you're living with her?

19 A Yeah.

20 Q I see. Do you have any children other  
21 than the one you're carrying?

22 A A five-year-old that I do not have  
23 custody of.

24 Q Did you voluntarily give up custody?

25 A No. When I was doing my time,

1 Children's Services decided to adopt my son  
2 out while I was in jail. I never signed any  
3 paperwork or anything.

4 Q So you're talking about Ashtabula  
5 County Children Services?

6 A Trumbull County.

7 Q So Trumbull County CSB filed a petition  
8 for custody?

9 A Mm-hmm.

10 Q Yes? You have to say yes.

11 A Yes. Sorry.

12 Q That's all right. And so your  
13 five-year-old child has been -- is he or she  
14 in foster care or has he or she been  
15 adopted?

16 A He was adopted out.

17 Q He was adopted.

18 A Closed adoption.

19 Q And were you served with any paperwork  
20 in relation to that?

21 A No.

22 Q What year did that happen?

23 A Right before I got out of Trumbull  
24 County Jail, sometime in April, 2014.

25 Q Are you employed?

1 A No.

2 Q When were you last employed full-time?

3 A When I worked at Pentair, which is in  
4 Chardon. It's a factory, in May of 2015.

5 Q 2015?

6 A Yeah.

7 Q And the name of the company, could you  
8 spell it?

9 A Pentair, P-E-N-T-A-I-R.

10 Q What kind of work did you do there?

11 A I made fiberglass tanks.

12 Q So it was production work?

13 A Mm-hmm.

14 Q Yes?

15 A Yes.

16 Q And why did you leave there?

17 A I had an injury where my finger got  
18 smashed by another employee when he picked  
19 up a tank, and I had to have surgery because  
20 it caused a blood infection in my blood  
21 stream from the fiberglass, and I was  
22 hospitalized for seven days and they fired  
23 me and he got my job.

24 Q So you were terminated?

25 A Yeah.

1 Q Did you file a Workers' Compensation  
2 claim?

3 A No.

4 Q Prior to Pentair, when did you last  
5 work?

6 A At Lake Effectz in Madison, Ohio,  
7 bartending.

8 Q And how long ago was that?

9 A I think February of 2015 I quit.

10 Q When you were fired by Pentair, did you  
11 attempt to collect unemployment  
12 compensation?

13 A Huh-uh. No.

14 Q What is the highest grade of formal  
15 education that you've completed?

16 A Tenth.

17 Q Do you have a GED?

18 A No, sir.

19 Q Where did you go to school?

20 A Edgewood and Jefferson and an  
21 alternative behavior school.

22 Q Where was the alternative behavior  
23 school?

24 A Ashtabula, Ohio on State Road.

25 Q Is that the school that you dropped out



1 of?

2 A Last attended, yeah.

3 Q Were you born and raised in Ashtabula?

4 A Yes, sir.

5 Q Apart from this case, have you been a  
6 plaintiff or a defendant in any civil case?

7 A Nope.

8 Q Can you tell me whether or not you've  
9 been convicted of one or more crimes of  
10 dishonesty in the last 10 years?

11 A Yes. I was convicted of a petty theft  
12 in 2012 or 2013.

13 Q In what court?

14 A Niles, and then out of Cortland, they  
15 had me for attempting to obstruct justice.

16 Q That was a Cortland court?

17 A Yeah. And through Ashtabula County, I  
18 have attempting to receive stolen property.

19 Q I'm sorry?

20 A Ashtabula County, I have attempting to  
21 receive stolen property of a lawn mower I  
22 bought. It was stolen I guess. I don't  
23 know.

24 Q And were you found guilty of each of  
25 those offenses?

1 A I pled guilty, yes.

2 Q Any other crimes of dishonesty?

3 A No.

4 Q So were you convicted -- you were  
5 convicted of attempted -- strike that.

6 Were you convicted of the charge of  
7 complicity?

8 A Complicity to?

9 Q To stolen property in 2012?

10 A Yeah.

11 Q And that was in Trumbull County?

12 A That was in Ashtabula County.

13 Q That's right. Judge Mackey is in  
14 Ashtabula County. You're absolutely right.  
15 Forgive me. Or was.

16 And why was an arrest warrant issued  
17 for your arrest?

18 A When?

19 Q In Ashtabula County.

20 A Just recently?

21 Q No. In 2013.

22 A Because I didn't go to probation or  
23 something. I really don't recall.

24 Q Any other convictions of crimes of  
25 dishonesty?

1 A Not that I can...

2 Q How about drug convictions?

3 A No.

4 Q Weren't you convicted of possession of  
5 drugs, a felony, in -- no, you weren't.  
6 Strike that. I'm sorry. Forgive me.

7 Have you been hospitalized in the last  
8 10 years other than for the birth of your  
9 child?

10 A Yes.

11 Q And for your finger?

12 A Yes, for my jaw. I broke my jaw in a  
13 dirt bike accident when I was 15.

14 Q How old are you now?

15 A 23.

16 Q Where were you hospitalized?

17 A ACMC.

18 Q For how long?

19 A A day until they could get me in for  
20 emergency surgery.

21 Q Any other hospitalizations?

22 A A couple of psychiatric times. I was  
23 in Belmont Pines on multiple occasions and  
24 Laurelwood and ACMC.

25 Q Were you also removed from your

1 family's home?

2 A Mm-hmm.

3 Q Yes?

4 A Yes.

5 Q You were placed in foster care?

6 A Yes. I was adopted when I was 6.

7 Q The hospitalizations in Laurelwood and,  
8 I'm sorry, what was the other one?

9 A Belmont Pines.

10 Q Was that as a juvenile?

11 A Mm-hmm.

12 Q Yes?

13 A Yes.

14 Q Any other hospitalizations as an adult?

15 A MetroHealth.

16 Q That was for the MOMS program?

17 A Yep.

18 Q Were you actually an inpatient there?

19 A Yes.

20 Q For how long?

21 A Three days.

22 Q Are you still on that program?

23 A Huh-uh.

24 Q Why not?

25 A Because I took myself out of it.

1 Q Why?

2 A Because I told them I didn't want to be  
3 on anything and they put me on methadone, so  
4 I detoxed off the methadone and haven't done  
5 anything or wanted to be on anything.

6 Q Have you described for me all of your  
7 hospitalizations in the last 10 years?

8 A As far as I can remember.

9 Q How about the name of the physicians,  
10 can you tell me the names of the physicians  
11 with whom you've treated?

12 A I know Dr. Ajit was one of them.

13 Q Spell his name.

14 A A-J-I-T, if I'm correct. Ajit.

15 Q What did you treat with him for?

16 A Psychiatric. He was my psychiatrist.

17 Q As an adult or juvenile?

18 A As a juvenile, 16 and 17. And Dr.  
19 Devulapalli I think his name is from Belmont  
20 Pines.

21 Q Did you treat with Dr. LaBash of the  
22 Community Counseling Center?

23 A Yes.

24 Q Was that between 2009 and 2016?

25 A Yes.

1 Q Okay. Are you still treating with him?

2 A No.

3 Q When's the last time you treated with

4 Dr. LaBash?

5 A It's been a few months.

6 Q Okay. Did you stop going to him --

7 A Yeah.

8 Q -- voluntarily?

9 A Yes.

10 Q Why?

11 A Because, like I said, I didn't want  
12 anything and then when I went to go to the  
13 hospital to detox from the Subutex, they put  
14 me straight on to methadone.

15 Q So was Dr. LaBash somehow involved in  
16 the MOMS program at Metro?

17 A No.

18 Q So I guess it's unclear to me, then,  
19 why you would have stopped treating with Dr.  
20 LaBash. Did he also want to put you on some  
21 sort of --

22 A He had me on Subutex, which made me  
23 feel like I was high, and I didn't want it  
24 and I didn't want to feel like that.

25 Q And did you tell him that?

1 A Yeah.

2 Q And what did he say?

3 A He recommended me not doing it,  
4 recommended me not discontinuing the  
5 Subutex.

6 Q But you did anyway?

7 A But I did anyways.

8 Q Did you report that you had had severe  
9 opiate dependence for the last six or seven  
10 years?

11 A Mm-hmm.

12 Q Yes?

13 A Yes.

14 Q Do you know what your diagnosis was  
15 from Dr. LaBash?

16 A Opioid dependency.

17 Q Anything else?

18 A Hepatitis positive. Hepatitis C  
19 positive.

20 Q Anything else?

21 A That's all I can --

22 Q Were you diagnosed as suffering from  
23 severe opioid use disorder?

24 A Yes.

25 Q Severe cannabis use disorder?

1 A I wouldn't say severe, but, yes.

2 Q I'm just reading what's written here.

3 Were you diagnosed as suffering from  
4 posttraumatic stress disorder?

5 A Yes.

6 Q Including posttraumatic stress disorder  
7 for children six years and younger?

8 A Yes.

9 Q And do you know why you were diagnosed  
10 with that condition?

11 A My dad was a raging alcoholic and he  
12 used to beat my mom.

13 Q Were you diagnosed at any time as  
14 bipolar?

15 A Yes.

16 Q Also suffering from major depressive  
17 disorder?

18 A Yes.

19 Q With panic attacks?

20 A Yes.

21 Q And these are all conditions that you  
22 were diagnosed as suffering from before  
23 2014, aren't they?

24 A Yes.

25 Q And if I understand your testimony, Dr.



1 LaBash put you on a course of treatment  
2 which you took yourself off?

3 A Yes.

4 Q And you also enrolled in the MOMS  
5 program. That's a program for moms --

6 A With opiate dependency.

7 Q With opiate dependency and you took  
8 yourself out of that program as well?

9 A Mm-hmm.

10 Q Yes?

11 A Yes.

12 Q Did you counsel with Kelly Butler?

13 A From Community Counseling?

14 Q I can't tell if she was at Community  
15 Counseling or at Metro.

16 A I think she might have been at  
17 Community Counseling.

18 Q So did you counsel with her?

19 A Once or twice, yes.

20 Q That's all?

21 A Yeah.

22 Q Following your discharge from the  
23 Trumbull County Jail in 2014, did you  
24 receive any treatment or counseling for  
25 whatever problems you felt like you had?

1 A I tried going for it, but they kept  
2 trying to push me on to the Vivitrol shot  
3 instead of giving me the actual psychiatric  
4 help that I needed, because if they asked me  
5 if I was a drug addict, I'm going to tell  
6 you the truth, and they just kept pushing  
7 the subject and I ended up relapsing after  
8 that.

9 Q Okay. So the answer to my question,  
10 did you receive any --

11 A No.

12 Q -- any counseling -- I'm sorry. You  
13 have to let me finish asking the question.

14 A I'm sorry.

15 Q Did you receive any counseling for any  
16 condition which you claim was caused by your  
17 incarceration at the Trumbull County  
18 detention facility or made worse by your  
19 incarceration at the Trumbull County  
20 detention facility in 2014?

21 A No.

22 Q No counseling in 2015, '16 or '17,  
23 correct?

24 A No.

25 Q No, it's not correct?

1 A No, it is correct.

2 Q Thank you. Did you report that you  
3 were the subject of domestic violence at  
4 home when you were living with your mother  
5 and father?

6 A Did I report it?

7 Q Yes.

8 A No. It was reported by other people.

9 Q I see. Do you also have a history of  
10 self-mutilation?

11 A Yes.

12 Q Cutting your wrists?

13 A My legs.

14 Q Were you admitted to the hospital in  
15 July of 2016 with symptoms of heroin  
16 withdrawal and leukocytosis?

17 A Yes.

18 Q And how long were you hospitalized  
19 then?

20 A Three days, I think. Maybe two and a  
21 half, three days.

22 Q According to my notes, it says that  
23 your physical exam was limited due to your  
24 lack of compliance. What does that mean?

25 A I have no idea.

1 Q Well, did you cooperate with the  
2 medical professionals?

3 A I --

4 Q You don't remember?

5 A No, I really don't.

6 Q Were you at any time ever involuntarily  
7 committed to the hospital?

8 A Involuntarily?

9 Q Yes.

10 A No.

11 Q Were you aware that your mother  
12 requested an involuntary commitment?

13 A Oh, yeah. That was in July?

14 Q Yes, of 2016?

15 A Yeah, but I went willingly.

16 Q Oh, so you agreed to go?

17 A Yeah. She just made it to where I  
18 couldn't sign myself out.

19 Q Is that as a consequence of your  
20 relapse?

21 A Yes.

22 Q When did you relapse?

23 A 2015 when I was working at Lake Effectz  
24 in Madison.

25 Q What were you doing there?

1 A Bartending. Not the best environment.

2 Q So you relapsed for more than a year,  
3 started using again?

4 A No. I stopped and then I started  
5 again, but that was when I first relapsed  
6 was at Lake Effectz.

7 Q Are you continuing to treat with Lake  
8 Obstetrics?

9 A Lake County?

10 Q For your OB?

11 A No. I have to transfer back to  
12 Ashtabula County.

13 Q Are you currently receiving any  
14 counseling at all?

15 A No.

16 Q And the last time you received  
17 counseling was before you went to jail in  
18 2014?

19 A Yeah.

20 Q Did you ever follow the advice you got  
21 in July of last year to enter a 12-step  
22 program as the advice you received at ACMC?

23 A Yeah. I was in IOP when I was seeing  
24 Dr. LaBash.

25 Q Did you also use and abuse amphetamines

1 as well?

2 A Yes, at one point.

3 Q Would that have been in 2016?

4 A Possibly.

5 Q Do you recall that I served you with a  
6 series of written questions that you were to  
7 answer under oath --

8 A Yes.

9 Q -- called interrogatories? And did you  
10 actually provide answers to those questions?

11 A Yes.

12 Q I've got some follow-ups that I'd like  
13 to ask you about.

14 I asked you to state the last name --  
15 the name, last known address and telephone  
16 number of every person who has knowledge  
17 concerning the allegations in the lawsuit  
18 that you filed, and that was Interrogatory  
19 Number 3.

20 The names Kevin Rafferty and Ernie  
21 Sherman appear on this list. Kevin is  
22 Michele's father?

23 A Yes.

24 Q And Ernie is your father?

25 A Yes.

1 Q Am I correct in assuming that your  
2 father knows nothing about this apart from  
3 what you've told him?

4 A No. Actually Detective Stewart  
5 contacted my dad to get ahold of me about it  
6 when they brought me in for questioning the  
7 first time.

8 Q Because you had already been released?

9 A Yes.

10 Q All right. And does your dad have any  
11 personal knowledge of what went on, or just  
12 what other people told him?

13 A He knows a little bit on both ends.

14 Q Well, how would he have personal  
15 knowledge of what happened while you were in  
16 --

17 A Well, through me.

18 Q From you?

19 A Yes.

20 Q But of his own knowledge, he doesn't?

21 A No.

22 Q I see you have some notes before you.  
23 What are those?

24 A Oh, just the things that you were  
25 asking Michele, the last 10 years of the

1 places or hospitalizations.

2 Q May I see your notes, please? Let your  
3 lawyer see it first.

4 MR. RASKIN: Thank you.

5 BY MR. RASKIN:

6 Q There are some notations on this yellow  
7 sheet of paper you've handed me that says  
8 Abilify, Geodon, Adderall, Vyvanse, Seroquel  
9 and Zoloft. Are those medications that  
10 you're currently taking?

11 A No. Those are past medications.

12 Q Are you on any medication today at all?

13 A No.

14 Q Before coming here today, did you and  
15 Michele talk about your testimony?

16 A No.

17 Q Who is Keith James --

18 A That's my kid's dad.

19 Q Who's Arthur Karieski, K-A-R-I-E --

20 A Keith James Arthur Kanieski.

21 Q I'm sorry?

22 A Keith James Arthur Kanieski is my kid's  
23 dad.

24 Q Oh, that's all one name?

25 A Yes.



1 Q Keith James Arthur Kanieski. Okay.

2 Thank you.

3 A And then Thomas is my boyfriend.

4 Q And is he the father of your child?

5 A No. Keith is.

6 Q I see. Looks like you were writing  
7 notes back and forth. Who were you writing  
8 them to?

9 A My lawyer.

10 MR. RASKIN: I apologize.

11 MS. KOVOOR: That's all  
12 right.

13 MR. LAMBROS: No, I watched  
14 her during the testimony of  
15 Michele. She was taking notes like  
16 you and I and Sarah take notes,  
17 Todd.

18 We ought to get away from the  
19 implications of somebody holding a  
20 note.

21 MR. RASKIN: No  
22 implications.

23 BY MR. RASKIN:

24 Q Have you treated with or met Dr. Robert  
25 Gordon?

1 A I don't recall.

2 Q Have you ever gone to Texas to be  
3 evaluated by a psychologist?

4 A No.

5 Q While you were in the Trumbull County  
6 detention facility, did you counsel with  
7 anyone from Coleman?

8 A Honestly, I don't remember.

9 Q You know what Coleman is?

10 A Yeah.

11 Q What is it?

12 A It's their, like, signature, I don't  
13 know, counseling place or -- I don't know.

14 Q It's for mental health counseling?

15 A Yes.

16 Q So while you were in the Trumbull  
17 County detention facility in 2014, you  
18 didn't, as far as you can recall, counsel  
19 with anyone from Coleman?

20 A Yeah, I don't remember.

21 Q You were only in the Trumbull County  
22 detention facility once; is that right?

23 A Twice altogether.

24 Q When was the other?

25 A In 2011 maybe or 2012 when they first,

1     like, arrested me for the charge of  
2     attempting to obstruct justice. I went  
3     there for a whole day and had to bond out,  
4     and then went back in 2013.

5     Q     And you were in for about six months?

6     A     Yes. Got there in November, left April  
7     30th.

8     Q     And have you been in jail anyplace else  
9     since then?

10    A     No, not since I got out.

11    Q     Have you spoken to any of the other  
12    women who were in your pod about this case  
13    since you've been discharged?

14    A     No.

15    Q     I asked you a question in Interrogatory  
16    Number 14 to specify in detail the damages  
17    you claim to have sustained as a result of  
18    the allegations contained in your Complaint,  
19    and your response was "Emotional and  
20    psychological damage, emotional distress,  
21    anxiety, PTSD, nightmares, panic attacks  
22    which have increased in intensity and have  
23    not subsided." Did I read your answer  
24    accurately?

25    A     Yes.

1 Q It is true, is it not, that no  
2 psychologist, psychiatrist or behavioral  
3 health professional has diagnosed you as  
4 suffering from any mental health condition  
5 which has gotten worse since your discharge  
6 from Trumbull County Jail, correct?

7 A Correct.

8 Q Thank you. And each one of the  
9 conditions that you described for me in  
10 response to Interrogatory Number 14 you had  
11 well before you ever got into Trumbull  
12 County Jail, didn't you?

13 A Correct, but it didn't help matters at  
14 all.

15 Q Did you at any time -- well, strike  
16 that.

17 You heard the questions I asked Ms.  
18 Rafferty concerning the kite system --

19 A Yes.

20 Q -- in Trumbull County?

21 A Yes.

22 Q And you would agree it's a three-part  
23 form?

24 A Honestly, I've never seen one before.

25 Q Well, I guess that answers the next

1 series of questions I had.

2 So am I correct in assuming that you  
3 never wrote a kite for the purposes of  
4 alerting jail administration?

5 A No.

6 Q Specifically Sheriff Altieri or  
7 Lieutenant Shay about the conduct which you  
8 complain about in this lawsuit?

9 A No, I never got a chance to get a kite  
10 in my possession.

11 Q Well, did you ever ask for one?

12 A I asked Nobbs if I could talk to her  
13 about it and she was supposed to come and  
14 talk to me and never came and talked to me.

15 Q Who's --

16 A Nobbs? She's a corrections officer.

17 Q Okay. Did you request a kite from  
18 Corrections Officer Nobbs?

19 A A kite and for her to come and talk to  
20 me about it and she never came back, so I  
21 just let it go.

22 Q Is Nobbs N-O-B-S?

23 A N-O-B-B-S, I believe.

24 Q When did you request a kite from  
25 Corrections Officer Nobbs?

1 A About maybe 60 days prior to my  
2 release.

3 Q Do you know that or are you guessing?

4 A I'm estimating.

5 Q Okay. So, let's see, you were released

6 --

7 A April 30th.

8 Q I'm sorry?

9 A April 30th I was released.

10 Q And so you think sometime --

11 A Anywhere from a month or two months  
12 before.

13 Q So you think about 60 days before,  
14 which would have been the end of February?

15 A Possibly, yes.

16 Q So is it your testimony that Mr.  
17 Drennen had engaged in one or more  
18 inappropriate acts with you in February of  
19 2014?

20 A Yes.

21 Q Are you guessing or are you --

22 A No, I'm saying yes.

23 Q When in February?

24 A I couldn't tell you when.

25 Q What makes you confident that it was

1 February?

2 A Because it slowed down more towards the  
3 end of my stay. He was sexually  
4 misconducting.

5 Q I understand, but how is it that it  
6 wasn't in March? I'm just trying to  
7 understand what your thinking is when you  
8 say that you made this request in February  
9 as opposed to March or January?

10 A Because I'm almost certain it was  
11 almost two months. It could have been less  
12 than two months, but it was definitely close  
13 to the end of my stay.

14 Q So sometime close to the end of your  
15 stay. Was Corrections Officer Nobbs doing  
16 rounds?

17 A She was supposed to come back after her  
18 rounds and she never did.

19 Q No, I understand. But when you  
20 approached her initially, was she doing  
21 rounds?

22 A Yes.

23 Q And what did you tell her?

24 A I said, "I need to talk to you about a  
25 situation and I would like to have a kite,"

1 and she never came back.

2 Q So you didn't report to Corrections  
3 Officer Nobbs that former CO Drennen was  
4 acting in a sexually inappropriate way with  
5 you, did you?

6 A No, because I wasn't going to say it  
7 out loud in front of everybody.

8 Q But the answer to my question is no,  
9 you didn't report that, correct?

10 A Yes.

11 Q And you never reported that to  
12 Lieutenant Shay or Sheriff Altieri either,  
13 did you?

14 A Nope. I just gave up after that.

15 Q You didn't report the conduct of former  
16 Corrections Officer Drennen to any member of  
17 jail administration at any time during your  
18 incarceration in Trumbull County, did you?

19 A Nope.

20 Q Did you ever see Corrections Officer  
21 Nobbs again in your pod after the day you  
22 asked her to come back and talk to you?

23 A Yes, but I just -- like I said, I let  
24 it go.

25 Q So you never re-engaged her with a



1 request for a kite or with information  
2 concerning the treatment you were receiving  
3 from Corrections Officer Drennen, correct?

4 A No.

5 Q Does "no" mean you didn't do that?

6 A No, it means like -- that --

7 Q Let me strike that and I'll ask it  
8 again.

9 Did you see Corrections Officer Nobbs  
10 after the day on which you asked her to come  
11 talk to you?

12 A Yes.

13 Q And on those subsequent occasions when  
14 you saw Corrections Officer Nobbs, did you  
15 request a kite to report former Officer  
16 Drennen's conduct?

17 A No.

18 Q Did you tell her about former Officer  
19 Drennen's conduct?

20 A No.

21 Q Okay. You heard Ms. Rafferty describe  
22 that she believed that you had engaged --  
23 well, strike that.

24 You heard Ms. Rafferty describe that on  
25 three to four occasions during the time the

1 two of you were housed together, you bared  
2 your breasts to former Corrections Officer  
3 Drennen?

4 A Yes, upon his request.

5 Q And do you agree that that happened  
6 three to four times?

7 A Yes.

8 Q And you heard Ms. Rafferty testify that  
9 on one or two occasions, you masturbated --

10 A Yes.

11 Q -- for former Corrections Officer  
12 Drennen? Do you agree that that's the  
13 frequency and time when that occurred?

14 A Yes.

15 Q So over a 60-day period of time, there  
16 were four to five encounters with yourself  
17 and former Corrections Officer Drennen where  
18 you either exposed a part of your body to  
19 him or masturbated at his request?

20 A Yes, because he asked for it.

21 Q And on none of those occasions, either  
22 before or after, did you report that conduct  
23 to anyone in jail administration at all,  
24 correct?

25 A Yes.

1 Q You also heard Ms. Rafferty testify  
2 that when she asked you why you were doing  
3 that, you said that you -- she attributed to  
4 you the statement that you enjoyed the  
5 attention that you were getting. Is that  
6 true?

7 A Yes.

8 Q And that's why you didn't report him,  
9 right, because you enjoyed it?

10 A Right, and he was also intimidating to  
11 me.

12 Q But the fact that you enjoyed the  
13 attention you were getting from him is why  
14 you didn't report him, at least in part,  
15 right?

16 A Partially, yes.

17 Q Now, you say that former Corrections  
18 Officer Drennen intimidated you?

19 A He was -- yes.

20 Q Did he threaten you in any way?

21 A No. He just came across as  
22 intimidating to me.

23 Q By words that he used?

24 A His appearance.

25 Q His physical appearance?

1 A Yes.

2 Q So he didn't verbally threaten you in  
3 any way?

4 A Never to me.

5 Q And former Corrections Officer Drennen  
6 didn't touch you inappropriately at any  
7 time, did he?

8 A No.

9 Q Of your own personal knowledge, you  
10 don't know what training former Corrections  
11 Officer Drennen had in corrections?

12 A No, I do not.

13 Q You were diagnosed as suffering from  
14 bipolar disorder in 2009; were you not?

15 A Yes.

16 Q Were you homeless in October of 2016?

17 A No, but yes.

18 Q Okay. By that, do you mean you were  
19 living with a friend, but you had no place  
20 --

21 A I was living with my mom, but it wasn't  
22 supposed to be known at the time.

23 Q Okay. What do you mean by that?

24 A Her landlord only approved for her and  
25 her husband to live there and I was staying

1     there without her landlord knowing.

2     Q     Well, why would you have lied to the  
3     Community Counseling Center of Ashtabula  
4     about your living arrangements?

5     A     I never lied to him. When he picked me  
6     up from my mom's work, when he said that I  
7     was sleeping in her car, I was sleeping in  
8     her car because I went to work with her that  
9     day.

10    Q     When who picked you up?

11    A     Dave from Community Counseling.

12    Q     According to the records that I've  
13    reviewed, it indicates in October you were  
14    homeless and living with a friend. Is that  
15    not true?

16    A     My mom being the friend.

17    Q     I see.

18    A     Yeah.

19    Q     And you lied about that because you  
20    thought that would violate your mother's  
21    lease?

22    A     It would have violated her lease  
23    because of who her landlord is.

24    Q     Who's her landlord?

25    A     Tony. I don't know his last name. I

1 just know his name is Tony. He owns the old  
2 Guerriero's Funeral Home in Ashtabula, Ohio.

3 Q Did you report to the counselor, Kelly  
4 Butler, at the Community Counseling Center  
5 of Ashtabula that you were hospitalized  
6 numerous times for self-harm behavior?

7 A Yeah.

8 Q You were hospitalized at Laurelwood at  
9 age 17?

10 A Yes.

11 Q You were also diagnosed in 2016 -- I'm  
12 sorry, you were also diagnosed in 2000 --  
13 well, when you were at Laurelwood with  
14 severe major depressive disorder?

15 A Mm-hmm.

16 Q Yes?

17 A Yes.

18 Q And also with posttraumatic stress  
19 disorder, correct?

20 A Yes.

21 Q Were you continuing to use opiates  
22 during your pregnancy?

23 A No, I wasn't continuing. I had gotten  
24 off of opiates when I was almost four and a  
25 half months pregnant.

1 Q So at 12 weeks pregnant, you were using  
2 opiates?

3 A Yes.

4 Q And you reported that to Ashtabula  
5 Community Counseling Center, didn't you?

6 A Yes, and that's when they helped me get  
7 into the MOMS program.

8 Q Which you then dropped out of?

9 A Yes.

10 Q Did you enter a level 1B intensive  
11 outpatient treatment program through  
12 Ashtabula County Community Counseling Center  
13 as they suggested?

14 A IOP? Is that what they consider IOP?

15 Q I don't know what that -- I don't see  
16 anything written like that. It says a 1B  
17 intensive -- yeah, I guess IOT could be  
18 slang for that.

19 A Yes.

20 Q Did you enter that program?

21 A Yes.

22 Q Are you still in it?

23 A No.

24 Q And the reason?

25 A Because I got off of the Subutex.

1 Q So that program required you to be on  
2 Subutex?

3 A Yes.

4 Q So am I correct in understanding that  
5 the program you entered into in order to  
6 protect your baby, the MOMS program, you  
7 voluntarily left?

8 A Yes, because I didn't want to see my  
9 child detox.

10 Q And the program for your own physical  
11 and emotional well-being that Ashtabula  
12 County Counseling Center recommended, what  
13 you referred to as the IOT program, you also  
14 left?

15 A Yes.

16 Q Were you admitted as an inpatient to  
17 detox from heroin in July of 2016 --

18 A Yes.

19 Q -- at Ashtabula County Medical  
20 Center? When you went to the Ashtabula  
21 County Medical Center and the Ashtabula  
22 Counseling Center, you were asked to give a  
23 history of why you were there, weren't you?

24 A When I went in 2016?

25 Q Yes.



1 A I believe so.

2 Q Okay. And when you were at the  
3 Ashtabula County Counseling Center in 2016

4 --

5 A Mm-hmm.

6 Q -- you didn't make any mention of  
7 anything that happened while you were in the  
8 Trumbull County Jail as any of your  
9 complaints at all, did you?

10 A No.

11 Q When you were at the Ashtabula County  
12 Medical Center, your chief complaints were  
13 drug problems and depression, weren't they?

14 A Yeah.

15 Q No mention of Corrections Officer  
16 Drennen, anything that happened to you while  
17 you were in the Trumbull County detention  
18 facility, right?

19 A No.

20 Q And when you were taken to the MOMS  
21 program at Metro, once again, no mention at  
22 all in any of your complaints about what  
23 happened when you were incarcerated,  
24 correct?

25 A No, because I learned how to block

1 things out.

2 Q The fact of the matter is you were  
3 asked what problems you were suffering from  
4 and that wasn't one of the problems you  
5 described, was it?

6 A No.

7 Q You don't have any facts to share with  
8 me, do you, that Sheriff Altiere knew  
9 anything about what you claim Corrections  
10 Officer Drennen was doing to you, correct?

11 A No, because when I left, I left  
12 everything at the door. I didn't want to  
13 take it home.

14 Q And likewise, you have no facts to  
15 share with me that Lieutenant Shay knew  
16 anything about what Corrections Officer  
17 Drennen, you claim, was doing to you,  
18 correct?

19 A Correct. I didn't even know what he  
20 was for.

21 Q And you don't have any facts to share  
22 with me one way or another concerning the  
23 training that former Corrections Officer  
24 Drennen had as a corrections officer or law  
25 enforcement officer, do you?

1 A Can you --

2 Q Repeat that?

3 A Yes.

4 Q You don't know what training former  
5 Corrections Officer Drennen had as a  
6 corrections officer or a law enforcement  
7 officer, do you?

8 A No.

9 Q And you also don't know what  
10 supervision he received as a corrections  
11 officer at Trumbull County, do you?

12 A No.

13 Q Did Corrections Officer Drennen make  
14 any promises to you about what he would do  
15 for you if you engaged in the conduct he  
16 asked you to engage in?

17 A No.

18 Q You were never strip-searched in the  
19 Trumbull County detention facility, were  
20 you?

21 A No, but he did ask me to remove  
22 articles of clothing.

23 Q Right. But he never strip-searched  
24 you, did he?

25 A No.

1 Q Did you ever say to Drennen, "No, I'm  
2 not going to do" --

3 MR. LAMBROS: I didn't  
4 understand that last question.

5 MR. RASKIN: She said no.

6 MR. LAMBROS: No, I  
7 understand what she said, but it's  
8 the manner in which you're forming  
9 the question. She was stripped.

10 MR. RASKIN: I said  
11 strip-searched.

12 MR. LAMBROS: What's the  
13 difference? The search -- a search  
14 is looking, seeing, and the object  
15 of take your clothes off is so that  
16 individual can look and search.

17 So what you're doing, you're  
18 getting into legal discussions and  
19 putting a question to her that isn't  
20 appropriate.

21 MR. RASKIN: Thank you.

22 MR. LAMBROS: Thank you for  
23 recognizing it.

24 BY MR. RASKIN:

25 Q Did you ever tell former Corrections

1 Officer Drennen that you would not remove  
2 whatever article of clothing or articles of  
3 clothing he asked you to remove?

4 A No, because I was intimidated by him.

5 Q Did he threaten you if you didn't do as  
6 he asked?

7 A No, but I didn't know what to expect if  
8 not.

9 Q And to be clear, former Corrections  
10 Officer Drennen never touched you at all; is  
11 that correct?

12 A Not physically, no.

13 Q Of your own personal knowledge, you  
14 are unaware of any similar conduct by former  
15 Corrections Officer Drennen towards any  
16 other female inmates, are you?

17 A Can you repeat the --

18 Q Of your own personal knowledge, are you  
19 aware of any similar conduct former  
20 Corrections Officer Drennen engaged in with  
21 any other females?

22 A Like other females as he did to me?

23 Q Yes.

24 A Yes.

25 Q Who?

1 A Jessica Friend.

2 Q Did you observe that?

3 A No. I've heard her talk about it.

4 Q Okay. So that's what I meant when I  
5 said of your own personal knowledge.

6 So did you actually observe former  
7 Corrections Officer Drennen engage in  
8 similar conduct with Jessica Friend or any  
9 other female inmate?

10 A No, but I did witness Jessica -- Lean?

11 Q Jessica Dean?

12 A I think that was her name. She was the  
13 girl that used to make thongs out of the  
14 paper underwear. I'm pretty sure that's her  
15 name. I'm not a hundred percent sure.

16 Q That's not a name that --

17 MS. KOVOOR: It was  
18 Jessica Dean.

19 BY MR. RASKIN:

20 Q Were you in the same pod?

21 A Yes. I was on the boat on the floor at  
22 that time because I got removed out of  
23 Trustee Pod.

24 Q I see. And do you know whether or not  
25 Jessica Dean ever reported that?

1 A No, I do not know.

2 Q And what did you see specifically that  
3 Jessica Dean did?

4 A She would dance in front of her door  
5 when he would walk through and he would stop  
6 and stand there for a moment.

7 Q Did you ever hear former Corrections  
8 Officer Drennen ask her to do that?

9 A No.

10 Q Okay. So let me make sure that I  
11 understand. You're saying that the facility  
12 was overcrowded, so were you sleeping on a  
13 mat?

14 A On a boat, yeah, the plastic beds they  
15 have.

16 Q Yeah, and that's in the day room?

17 A Yes.

18 Q So you were in a position to observe --

19 A Everything.

20 Q -- what Jessica Dean did and where  
21 former Corrections Officer Drennen was at  
22 the time?

23 A Mm-hmm, yes.

24 Q And did you report that to jail  
25 administration?

1 A No.

2 Q Did you keep any type of a diary or any  
3 writing at all to record what happened and  
4 when?

5 A No, I shouldn't have had to because  
6 there's a lot of cameras in the building.

7 Q My question is did you?

8 A No.

9 Q Was it your impression that the cameras  
10 were recording what you were doing?

11 A They record everything.

12 Q So it's your understanding that the  
13 cameras record every square inch of the  
14 detention facility?

15 A Yes, as far as I know.

16 Q Okay. Do the cameras move or are they  
17 fixed?

18 A I don't know if they move or not.

19 Q Well, weren't you in a pod?

20 A Yes, but there's black over the camera,  
21 like tinted over the camera so you can't see  
22 the camera personally, but it can see you.

23 Q Well, I was just in the pod that you  
24 were housed in and the camera was fixed in  
25 the corner --



1 A Yes.

2 Q -- right up by the ceiling in the wall.

3 A Yes.

4 Q So you can see where the camera was,  
5 right?

6 A Right, but you can't see the actual  
7 camera itself, but it sees you.

8 Q You knew where it was?

9 A Yes.

10 Q And you could see that it didn't move,  
11 couldn't you?

12 A I never paid attention to the cameras.

13 Q Never paid attention. Okay. Fair  
14 enough.

15 Did former Corrections Officer Drennen  
16 ever say to you that he had been  
17 investigated at any time prior to your  
18 incarceration for similar conduct?

19 A No.

20 Q You have to take your hand away --

21 A No.

22 Q -- from your mouth, please. Okay.

23 Thank you. Just so Angie can hear you and  
24 so an old guy like I can hear you.

25 So Drennen never told you that; is that

1 right?

2 A Yes.

3 Q And you don't have any facts to share  
4 with me that Drennen was ever accused of  
5 such a thing at any time prior to your  
6 incarceration, do you?

7 A As far as my knowledge, no.

8 Q So you were already discharged from  
9 the Trumbull County detention facility when  
10 the subject of former Corrections Officer  
11 Drennen's alleged conduct came to light; is  
12 that right?

13 A Yes.

14 Q And is that why Major Stewart reached  
15 out to your dad, in an effort to find out  
16 where he could reach you or how he could  
17 reach you?

18 A Yes.

19 Q And did your father have that  
20 information?

21 A Yes. I was living with my father at  
22 the time.

23 Q And so did you speak with Major  
24 Stewart?

25 A My father drove me from Jefferson, Ohio

1 to the Trumbull County Jail for questioning.

2 Q Did you give a written statement?

3 A No. It was audio.

4 Q Okay. So Major Stewart told you he was  
5 going to record the questions he asked and  
6 the answers you gave?

7 A Yes, but he never really explained to  
8 me why I was there and it was really awkward  
9 talking to a man my dad's age about the  
10 things that happened.

11 Q Well, what did Major Stewart tell you  
12 the reason was for his wanting to interview  
13 you?

14 A Allegations against Drennen.

15 Q What allegations?

16 A Sexual miscon -- the sexual whatever  
17 you guys say.

18 Q Well, you tell me in your own words.  
19 You're testifying.

20 A Sexual misconduct.

21 Q Okay. So when you say it was really  
22 awkward, was it awkward because you had to  
23 answer his questions or you were asked to  
24 answer his questions and he was a man who  
25 was the age of your dad?

1 A Yes.

2 Q Was your dad in the room at the time  
3 that you and Major Stewart talked?

4 A No.

5 Q Was anybody else in the room other than  
6 you and Major Stewart?

7 A No.

8 Q Did Major Stewart tell you what the  
9 allegations were against Corrections Officer  
10 Drennen?

11 A Yes, and then he went into detail with  
12 questionings and then I just didn't want to  
13 deal with it.

14 Q So what allegations specifically did  
15 Major Stewart tell you had been brought  
16 against former Corrections Officer Drennen?

17 A About me and his whatever. When he  
18 would come in, receive notes from me, I  
19 would show him my breasts when he would ask  
20 me to, I would take articles of clothing off  
21 when he asked me to, but I denied it all in  
22 the recording because I didn't want to deal  
23 with it.

24 Q So when Major Stewart asked you whether  
25 or not these things were true, you said they

1     were not?

2     A     Yes, because I did not want to deal  
3     with it.

4     Q     So you lied to Major Stewart?

5     A     Yes.

6     Q     In fact, you denied that any of the  
7     things that Michele Rafferty said you did  
8     actually happened, didn't you?

9     A     Yes, because I didn't want to deal with  
10    it. I didn't want to be publicly humiliated  
11    or anything.

12    Q     Well, you were in a private room with a  
13    law enforcement officer; were you not?

14    A     Right, but eventually it is now in the  
15    paper, correct? So, like, that's publicly  
16    exploit, and that's what I didn't want to  
17    have happen. But now for justice, sure, go  
18    for it.

19    Q     So it's okay for it to be public now,  
20    but not okay for --

21    A     It wasn't --

22    Q     You have to let me ask my question,  
23    please.

24            So it's okay for it to be public now,  
25    but not okay for you to honestly say what

1 happened when you were in a private room  
2 with a law enforcement officer; is that your  
3 testimony?

4 A I was in the room with a grown man my  
5 dad's age. It made it very awkward, so I  
6 didn't want to talk about it.

7 Q Did you ask Major Stewart if he would  
8 make arrangements to have a female  
9 corrections officer interview you instead of  
10 him?

11 A No, because, like I said, I didn't want  
12 to relive it. I didn't want to have to be  
13 there again.

14 Q Did you tell Major Stewart that you  
15 were uncomfortable with the questions he was  
16 asking you?

17 A No, because I was unprepared for any of  
18 that.

19 Q And you know the difference between  
20 telling the truth and lying, right?

21 A Yes.

22 Q And so you knew at the time that Major  
23 Stewart was asking you the questions that he  
24 was asking that you were intentionally being  
25 dishonest with him, correct?

1 A Correct, because I didn't want to deal  
2 with it.

3 MR. LAMBROS: I think  
4 there's a difference between  
5 dishonest and the circumstances  
6 under which Kathy (sic) had to  
7 confront an officer.

8 Here's a young girl, bipolar,  
9 posttraumatic stress syndrome. This  
10 girl was not well, and she's going  
11 to not understand the circumstances  
12 under which she would be interviewed  
13 at that time.

14 Dishonest? No, not  
15 necessarily dishonest. She wasn't.  
16 It was she was not admitting to what  
17 he was asking, but that wasn't under  
18 all these circumstances dishonest.

19 For that reason, I would  
20 think the question is inappropriate  
21 with respect to whether or not she  
22 was being dishonest.

23 BY MR. RASKIN:

24 Q You never complained about former  
25 Corrections Officer Drennen's unwanted

1 sexual conduct to either Sheriff Altieri or  
2 Lieutenant -- I just lost his name -- Eric  
3 Shay, did you?

4 A No.

5 Q Let me get that question out again so  
6 that it doesn't include my --

7 MS. KOVOOR: Is somebody  
8 knocking on the door?

9 MR. RASKIN: Off the  
10 record.

11 - - -

12 (Discussion had off the record.)

13 - - -

14 BY MR. RASKIN:

15 Q So one more time. You never reported  
16 the inappropriate conduct which you allege  
17 former Corrections Officer Drennen engaged  
18 in with you to either Sheriff Altieri or to  
19 Lieutenant Eric Shay, correct?

20 A Correct.

21 Q And, in fact, when you were questioned  
22 about it by Major Stewart, you denied it  
23 ever happened, correct?

24 A Correct.

25 Q Thank you. Did former Corrections



1 Officer Drennen ever threaten you with  
2 anything if you didn't do as he asked?

3 A No, it never got to that point because  
4 I didn't know what to expect if I didn't do  
5 it.

6 Q I understand that. I'm not saying --  
7 I'm not asking you if you ever resisted.  
8 I'm saying did he ever say --

9 A No.

10 Q -- threatening words to you, If you  
11 don't do as I ask, then this or that or the  
12 other thing will happen?

13 A No.

14 MR. LAMBROS: Isn't every  
15 request by a corrections officer an  
16 order, violation of an order  
17 comprised of punishment?

18 BY MR. RASKIN:

19 Q Do you know when you were contacted to  
20 meet with -- well, strike that.

21 Do you know when Ms. Rafferty made her  
22 complaint to jail administration? I know  
23 you had been released, but have you  
24 subsequently learned when that was or what  
25 the timeline was?

1 A Sometime in May, I know that.

2 Q When were you called in?

3 A At least maybe almost a week after I  
4 was out.

5 Q So it would have been sometime during  
6 the first week of May?

7 A Yeah.

8 Q Okay. I may have asked you this  
9 question. If I did, I apologize.

10 Have you spoken to any of the other  
11 women who were in the pod with you during  
12 the time that you claim Drennen engaged in  
13 this conduct --

14 A No.

15 Q -- about what they saw or said in the  
16 form of statements?

17 A No, I haven't.

18 Q Okay. Tell me how your life has been  
19 affected as a result of the treatment you  
20 claim that you suffered from by former  
21 Corrections Officer Drennen, please.

22 A Can you repeat that?

23 Q Sure. Tell me how your life has been  
24 affected as a result of the treatment that  
25 you claim you suffered from by former

1 Corrections Officer Drennen.

2 A My PTSD that I have grown over from  
3 being a child to an adult has definitely, I  
4 want to say, increased due to the fact of  
5 being sexually abused as a child.

6 Q Anything else, or have you completed  
7 your answer?

8 A Completed my answer.

9 Q Okay. So when you say your PTSD has  
10 increased, I want to make sure that I  
11 understand that.

12 Can we agree that there are symptoms  
13 associated with posttraumatic stress  
14 disorder?

15 A Yes.

16 Q What are the symptoms that you have  
17 which have gotten worse?

18 A I have vivid night terrors.

19 Q Night terrors?

20 A Yes, and flashbacks.

21 Q I think I asked this question, but just  
22 so that I'm clear, no doctor or behavioral  
23 health professional has said that your PTSD  
24 has gotten worse since you were released  
25 from jail; is that correct?

1 A Correct.

2 Q And when you say night terrors, do you  
3 mean nightmares?

4 A They're different than nightmares.

5 Q Tell me what the difference is.

6 A I wake up crying and shaking.

7 Q And with what frequency have you  
8 experienced night terrors since your  
9 discharge from the Trumbull County detention  
10 facility?

11 A Can you repeat that, sir?

12 Q How often have you -- well, strike  
13 that.

14 How often do you experience night  
15 terrors since you were discharged from the  
16 Trumbull County Jail?

17 A A lot. About three -- two to three  
18 times a week.

19 Q And how often were you experiencing  
20 night terrors before you went into the  
21 Trumbull County Jail?

22 A More so less, once or so a month.

23 Q And what about flashbacks, how often --  
24 well, first of all, what flashbacks were you  
25 experiencing before you went into the

1 Trumbull County Jail?

2 A Of my mom and dad with their physical  
3 altercations.

4 Q When you say your mom and dad with  
5 physical altercations, do you mean that your  
6 mom and dad were physically abusing you or  
7 each other?

8 A Each other. Like my mom stabbed my  
9 dad, my mom cut her wrist with glass.

10 Q And so you would have flashbacks to  
11 those events?

12 A Yeah.

13 Q Is that yes?

14 A Yes.

15 Q I'm sorry, do you need to take a  
16 break? I apologize.

17 MS. KOVOOR: Why don't we  
18 take a break?

19 - - -

20 (Short recess taken)

21 - - -

22 BY MR. RASKIN:

23 Q With what frequency do you experience  
24 flashbacks now versus before your  
25 incarceration?

1 A Now it's, like I said, it's more weekly  
2 than it used to be.

3 Q When you say, "more weekly," I know you  
4 know what you mean, but I don't. Do you  
5 mean once a week?

6 A Like a couple times a week.

7 Q Two --

8 A Two to three times a week.

9 Q So it's the same frequency as night  
10 terrors?

11 A Yes.

12 Q And how about before?

13 A They weren't as bad as my night  
14 terrors, so I'd say once every two months, I  
15 would say, two or three months.

16 Q And did your opiate use affect either  
17 your night terrors or flashbacks?

18 A No. That's how I numbed myself.

19 Q Okay. So they went away when you were  
20 doing drugs?

21 A Yes.

22 Q And when you stopped doing drugs, they  
23 returned?

24 A Yes.

25 Q So then you weren't -- you relapsed in

1 2015 and '16?

2 A Yes.

3 Q So does that mean you were not  
4 experiencing any night terrors or flashbacks  
5 in 2015 and '16 while you were doing drugs?

6 A No, I was not.

7 Q And then once you got off the opiates  
8 when you were four months pregnant,  
9 plus/minus, then the flashbacks and night  
10 terrors returned and with greater frequency?

11 A Yes.

12 Q Okay.

13 A Also doesn't help with the pregnancy  
14 either.

15 Q Have you described for me now all of  
16 the effects that you feel like that you've  
17 experienced which you attribute to the  
18 claims you make against former Corrections  
19 Officer Drennen?

20 A Yes.

21 MR. RASKIN: I don't have  
22 any further questions. Thank you.

23 - - -

24 CROSS-EXAMINATION OF KATIE SHERMAN

25 BY MS. JARMUSZ:

1 Q All right, Katie, I'm Angel Jarmusz.  
2 I know I introduced myself to Michele. As I  
3 said in her deposition, it's the same ground  
4 rules that you just went through with Mr.  
5 Raskin. I'll try to keep it even shorter  
6 than I did with Michele.

7 Again, I'm representing Mr. Drennen, so  
8 my questions are going to be specific to  
9 your interactions with him.

10 A Okay.

11 Q And I'm just going to get right to it  
12 and ask you how exactly Mr. Drennen  
13 personally injured you?

14 A Personally injured me? Well,  
15 definitely psychologically it injured me for  
16 sure, brought back a lot of different  
17 things, so I learned how to block it out.

18 Q With those psychological injuries  
19 caused by Mr. Drennen, did you seek medical  
20 or mental health treatment?

21 A No, because my main priority when I did  
22 seek treatment, it was not for that  
23 reasoning, it was for my child  
24 specifically.

25 Q When you were incarcerated in Trumbull



1 County, did you use the telephones?

2 A Not all the time. Barely.

3 Q Who did you talk to if you did use  
4 them?

5 A My dad.

6 Q And how come you never talked to your  
7 dad about Mr. Drennen's conduct?

8 A 'Cause that's not something I would  
9 talk to my dad about, honestly.

10 Q Did you ever personally witness Mr.  
11 Drennen masturbate in your presence?

12 A No.

13 Q Did any other corrections officer give  
14 you unwanted sexual attention?

15 A No.

16 Q What about you made Mr. Drennen seek  
17 you out?

18 MS. KOVOOR: Objection.

19 Speculation.

20 BY MS. JARMUSZ:

21 Q Do you have any -- let me rephrase  
22 this.

23 When you had spoken with Major Stewart  
24 in May of 2014, you remember that  
25 conversation?

1 A Yes.

2 Q You had said at that time, you had a  
3 little crush on Mr. Drennen while you were  
4 in the Trustee Pod; is that correct?

5 A Yes.

6 Q Did you ever express that crush to Mr.  
7 Drennen?

8 A Not specifically, no.

9 Q Can you describe for me the content of  
10 your notes that you would pass Mr. Drennen?

11 A Well, I mean, they were flirtatious, I  
12 guess, and nothing, like, derogatory of me  
13 expressing myself to him. It was more just  
14 like "Hey, how are you" kind of things and  
15 such. Nothing to the extent...

16 Q In any of those notes, did you suggest  
17 meeting up with him after you were  
18 released?

19 A Not that I can recall.

20 Q Did you ever observe other inmates pass  
21 notes to Mr. Drennen that weren't the formal  
22 kite requests?

23 A No.

24 Q Going back to that May 4th or 5th  
25 interview with Major Stewart in 2014, do you

1 remember him, Major Stewart, telling you  
2 multiple times that you were not obligated  
3 to answer his questions?

4 A Yes, but I didn't know if I was going  
5 to be in trouble or not because cops are  
6 allowed to lie to you and I just got out of  
7 jail, so that's why I denied it all because  
8 I didn't know what to expect the outcome to  
9 be.

10 Q This might sound repetitive, but I just  
11 want to clarify everything. Do you remember  
12 during that interview saying you were  
13 positive that you had never masturbated for  
14 Mr. Drennen?

15 A Yes.

16 Q And do you remember stating that Mr.  
17 Drennen had never asked you to expose  
18 yourself?

19 A Yes.

20 Q I think you probably answered this  
21 question, but if you were uncomfortable with  
22 Major Stewart's questioning, state again why  
23 you didn't stop answering those questions.

24 A I didn't know whether I was going to be  
25 in trouble or not.

1 MS. JARMUSZ: I honestly  
2 don't think I have anything  
3 further.

4 MR. RASKIN: Signature?

5 MS. KOVOOR: We'll read.

6 - - -

7 (Signature not waived)

8 (Deposition concluded at 4:45 p.m.)

9 - - -

CERTIFICATE

THE STATE OF OHIO, )

) SS:

COUNTY OF CUYAHOGA. )

I, Angelika P. Shane, a Notary Public  
within and for the state of Ohio, duly  
commissioned and qualified, do hereby  
certify that the within-named witness,  
KATIE SHERMAN, was by me first duly sworn to  
testify to the truth, the whole truth and  
nothing but the truth in the cause  
aforesaid; that the testimony then given by  
the above-referenced witness was by me  
reduced to stenotype in the presence of said  
witness; afterwards transcribed, and that  
the foregoing is a true and correct  
transcription of the testimony so given by  
the above referenced witness.

I do further certify that this  
deposition was taken at the time and place  
in the foregoing caption specified and was  
completed without adjournment.

1 I do further certify that I am not a  
2 relative, counsel or attorney for either  
3 party, or otherwise interested in the  
4 event of this action.

5 IN WITNESS WHEREOF, I have hereunto set  
6 my hand and affixed my seal of office at  
7 Cleveland, Ohio, this 6th day of March,  
8 2017.

9  
10   
11

12 Angelika P. Shane, Notary Public  
13 Within and for the State of Ohio  
14 My commission expires 6/21/20  
15

16 - - - o0o - - -  
17  
18  
19  
20  
21  
22  
23  
24  
25

## CERTIFICATE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CASE: Michele L. Rafferty, et al.,  
vs.  
Trumbull County, Ohio, et al.,

CAUSE NO.: 4:16CV00430

DEPONENT: KATIE SHERMAN

DATE REPORTED: February 23rd, 2017

DATE SENT FOR SIGNATURE: March 7, 2017

SENT FOR SIGNATURE TO: Katie Sherman  
6280 1/2 South Main Street  
Ashtabula, Ohio 44084

I, Angelika P. Shane, the undersigned Notary Public in and for the County of Cuyahoga, do hereby certify that the above-named deponent has failed to subscribe his/her signature to the original deposition transcripts and return same within the allotted 30 day limit under the Federal Civil Rules of Procedure after being notified the deposition is ready for reading and signing, and/or presented to the deponent or his/her attorney for signature.

Therefore, in accordance with the Rules of Procedure, this certificate is submitted. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notary seal this 10th of April, 2017.

  
NOTARY PUBLIC

My Commission Expires: 06/21/2020

TACKLA & ASSOCIATES  
1020 Ohio Savings Plaza  
1801 E. 9<sup>th</sup> Street  
Cleveland, OH 44114



Court Reporting, LLC

Court Reporting & Videotaping

www.tacklacourtreporting.com

216-241-3918 fax: 216-241-3935

1020 Ohio Savings Plaza

1801 East 9th Street

Cleveland, OH 44114



a member of:

www.table8litigationsolutions.com

March 7, 2017

Katie Sherman  
6280 1/2 South Main Street  
Ashtabula, Ohio 44084

Re: Deposition of **Katie Sherman**  
2/23/2017  
Michele L. Rafferty, et al. v. Trumbull County, Ohio, et al.

Dear Ms. Sherman:

As you will recall, you did not waive your right to read and sign your deposition. A copy of your deposition taken in the above referenced matter is now available in our office for review, weekdays from 8:30 a.m. to 4:00 p.m. Please call our office at 216-241-3918 for an appointment. You will have the opportunity to list any corrections on an errata sheet. You must then sign and date the errata sheet.

In accordance with the Federal Rules of Civil Procedure, you must read the transcript, and sign the errata sheet within 30 days. Should you have any questions, please don't hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Angie Shane".

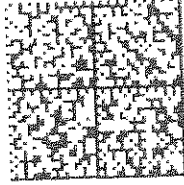
Angie Shane

TACKLA COURT REPORTING, LLC

AS/np

cc: Todd Raskin, Esq.  
Sarah Thomas Kovoov, Esq.  
Angelica M. Jarmusz, Esq.





**Tackla**  
& Associates  
Court Reporting & Videography  
[www.tacklacourtreporting.com](http://www.tacklacourtreporting.com)  
216-241-3918 Fax: 216-241-3935  
1020 Ohio Savings Plaza  
1501 East 9th Street  
Cleveland, OH 44114

Katie Sherman  
6280 1/2 South Main Street  
Ashtabula, Ohio 44084